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COLORADO DEPARTMENT OF HEALTH

Dedicated to protecting and improving the health and . environment of the people of Colorado

4300 Cherry Creek Dr. S. Denver, Colorado 80222-1530 4210 E. 11th Avenue Phone (303) 692-2000

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July 29, 1993

Mr. Richard J. Schassburger U.S Department of Energy Rocky Flats Plant Building 116 P. O. Box 928 Golden, Colorado 80402-0928 3 40 PH 193

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Covernor

Patricia A. Nolan A Executive Director

Appendix E, Quality Assurance Addendum (QAA) to IM/IRA Decision Document (Building 910) for the Solar Evaporation Ponds (OU-4), submitted July 12, 1993

Dear Mr. Schassburger:

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) has reviewed the subject document submitted by DOE and prime contractor, EG&G.

In the Division's comments dated June 24, 1993 to the draft QAA, objection was made to a 110 day annual limit for Building 910 operations. The approved Building 910 IM/IRA Decision Document does not permit DOE to restrict operation of the plant.

DOE, at this time, is prevented by the Air Pollution Control Division from exceeding the 110 day limit. However, DOE's unwillingness to seek a Prevention of Significant Deterioration Permit, which if approved would allow unrestricted operation of Building 910, is unacceptable.

DOE in addressing the Division's comment gave assurances that the 110 day flash evaporative capacity exceeds the expected demand. In the event, Interceptor Trench System flows or Solar Evaporation Pond water volumes require treatment in excess of 110 days per year, DOE will be in violation of the approved IM/IRA Decision Document. Consequently, the QAA will indefinitely carry a conditionally approved status.

If you have any questions concerning this issue, please call Harlen Ainscough o my staff at 692-3337.

Sincerely,

Gary W. Baughman, Chief

Facilities Section Hazardous Waste Control Program

Daniel S. Miller, AGO cc: Jackie Berardini, CDH-OE Martin Hestmark, EPA Arturo Duran, EPA Frazer Lockhart, DOE Scott Surovchek, DOE Ernie O'Toole, DOE Steve Keith; EG&G Don Ferrier, EG&G

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